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February 26, 2015

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Via ECF

Honorable Valerie E. Caproni
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 240
New York, New York 10007

Re: *UPT Pool Ltd. v. Dynamic Oil Trading (Singapore) Pte. Ltd., et al.*,
U.S.D.C., S.D.N.Y., Docket No. 14 Civ. 9262 (VEC)

Dear Judge Caproni:

We write on behalf of Plaintiff UPT Pool Ltd. ("UPT Pool") in the above-captioned matter and are joined by Defendants O.W. Bunker USA Inc., O.W. Bunker North America Inc., O.W. Bunker Holding North America Inc. (collectively, the "OW Debtors"), Harley Marine NY, Inc. ("Harley Marine") and ING Bank N.V. ("ING"). On January 20, 2015 Your Honor adjourned the initial pretrial conference in this matter to March 6, 2015 at the request of the above-listed parties.

As this Court is aware, presently sixteen interpleader actions related to the O.W. Bunker bankruptcy have been filed in front of Your Honor and are subject to several omnibus Orders, briefing schedules and hearing dates. Additionally, the interpleader parties have advised the Court of proceedings before the U.S. Bankruptcy Court for the District of Connecticut ("Connecticut Bankruptcy Court") and the joint application of the Official Committee of Unsecured Creditors (the "Committee") and the OW Debtors for transfer of venue to the U.S. Bankruptcy Court for the Southern District of New York.

Briefing by the parties in the interpleader actions regarding the Court's jurisdiction over vessels located outside this District took place as scheduled and was submitted on January 14, 2015 and February 4, 2015. By Order dated February 20, 2014 Your Honor has provided for briefing on this Court's subject matter jurisdiction in these actions to be completed by March 6, 2015 (ECF Doc. #43).

On February 18, 2015 an evidentiary hearing was held before Judge Schiff in the Connecticut Bankruptcy Court on the motion to transfer venue to the Southern District of New York. A second hearing on this motion is scheduled for March 9, 2015. Judge Schiff has indicated that at the conclusion of the hearing, he will request briefing on the relevant issues before issuing an opinion.

In light of the foregoing developments, the parties respectfully request an adjournment of the Initial Pretrial Conference currently scheduled for March 6, 2015 (with joint letter due February 27, 2015)

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until such time as the threshold issues presented by the hearing in Connecticut Bankruptcy Court and by the foregoing briefing concerning the Court's jurisdiction have been decided.

We thank the Court for its attention to these matters.

Respectfully submitted,



Marie E. Larsen

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